

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVIT T. COOPER, : CIVIL ACTION  
Plaintiff. : 08-346  
v. :  
REGINALD A. ROBERTS, ET AL., :  
Defendants. :  
:  
:

**FILED**

JUL 18 2008

MICHAEL E. KUNZ, Clerk  
By \_\_\_\_\_  
Dep. Clerk

PLAINTIFF DAVID T. COOPER, RESPONSE  
TO DEFENDANT REGINALD A. ROBERTS ANSWER  
TO REQUEST FOR DISCOVERY

Prepared by

Neighbourhood-Assistance

NON-ATTORNEY

www.neighbourhood-assistance.com

on behalf of Plaintiff,

David T. Cooper

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID T. COOPER, : RESPONSE TO DEFENDANT ANSWER  
Plaintiff. : TO REQUEST FOR DISCOVERY  
V. : CIVIL-ACTION No. 08-346  
REGINALD A. ROBERTS, ET AL., :  
Defendants. :  
:  
:

RESPONSE TO DEFENDANT ROBERTS ANSWER  
TO REQUEST FOR PRODUCTION OF DOCUMENTS

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 34

Plaintiff David T. Cooper, pro-se, has served Defendant Reginald A. Roberts with a proper Motion for Discovery under Rule 34 of the Federal Rules of Civil Procedure. On July 3, 2008, a full month after Defendant's Receipt of said Motion filed a general Denial Response by and through the assistance of New Counsel Jonathan B. Young. Plaintiff David T. Cooper, hereinafter referred to as Mr. Cooper submits the below response:

1. The Defendant's answer to Requests at #1-4, are not burdensome, nor is it an oppressive task for the Defendant to produce the very information that he is required by the 4th and 14th Amendments to have before he can have reasonable suspicion that Mr. Cooper has violated some Law, this information is therefore relevant to the claims made against the Defendant and the general

2. Defendant's Response to Request #6, is again a general and baseless denial, this information is relevant to showing clearly that the actions of the Defendant were in violation of Mr. Cooper's clearly established rights under the U.S. Constitutions 4th, 8th and, 14th Amendments. Moreover, this information will show that there simply is no justification for the actions taken by the Defendant's to this Action and there was no reason to assault Mr. Cooper and; Defendant's Response to Request #7, is a general baseless denial, this information is reasonably related to the claims against the Defendant and will provide clear and convincing proof that Mr. Cooper was not involved in any Criminal Activity and that Mr. Cooper was secured and assaulted again after being taken from the residence, thus, this information is both material and relevant to the claims made against Defendant Roberts, as there simply is not justification for the actions of the Defendant's.

Wherefore, the above stated response to Defendant's Answer to Request for Discovery, Mr. Cooper asks that this Court issue a Order to Defendant's to produce the Requested Materials.

DATE: 7-10-08

RESPECTFULLY SUBMITTED,  
David T. Cooper

CERTIFICATE OF SERVICE

I David T Cooper, Do hereby declare that I am the Plaintiff in the foregoing Response to Defendant Reginald A. Roberts Answer to Request for Discovery. I Certify that I have this day served a true and correct copy of the same upon the below named and in the manner indicated. I further state that statements made herein are true and correct based upon my Knowledge, Belief, Information and Experience, in accordance with the provisions under 28 U.S.C. § 1746.

(SERVICE BY U.S MAIL REGULAR CARRIER)

HONORABLE EDUARDO C.  
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Philadelphia, Pa 19106

JONATHAN B. Young,  
1500 Pennbrook Parkway  
Suite 200  
Lansdale, Pa 19446

COURT OF COURTS  
601 Market St  
Philadelphia, Pa 19106

DATED: 7-10-08

/s/ David T Cooper #HL 9533  
1100 Pike St SCI Huntingdon  
Huntingdon Pa 16654-1112

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Plaintiff. : No. 08-346

:

v. :

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Defendants. :

:

O R D E R

AND NOW, this 10<sup>th</sup> day of July, 2008, upon consideration of Plaintiff's Response to Defendant's Answer to Request for Production of Documents, and any other responses thereto, it is hereby ORDERED that Defendant Reginald A. Roberts Shall produce the Requested Discovery Materials within ten (10) days of this Court's Order.

BY THE COURT:

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EDUARDO C. ROBRENO, J.